

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Miami Division

JANE DOE,

Case No: 1:25-cv-20757-JB/Torres

Plaintiff,

vs.

STEVEN K. BONNELL II,

Defendant.

**PLAINTIFF JANE DOE'S MOTION FOR ENTRY OF AGREED ORDER
TO COMPEL LOLCOW LLC TO REMOVE VIDEOS**

COMES NOW Plaintiff Jane Doe, by and through undersigned counsel, and respectfully requests that the Court enter an agreed proposed order to compel Lolcow LLC/Kiwi Farms to remove specified URLs that link to the Video, and for the imposition of costs and attorney's fees on Defendant, as follows:

1. Plaintiff has been engaged in on-going efforts to have the Video¹ removed from the multiple different platforms on which it was published, including the Kiwi Farms platform. Kiwi Farms is managed and operated by Lolcow LLC. The Video was originally published on Kiwi Farms on November 29, 2024. (*See* ECF 1). On February 20, 2025, two days after the Complaint in this action was filed, the custodian of records of Kiwi Farms removed the original post of the Video, and replaced it with the following message:

¹ The Video is that certain video depicting Plaintiff that was non-consensually shared by Defendant Bonnell, and as further defined in the Complaint. ECF 1.

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In light of a lawsuit filed against Destiny for allegedly unlawful dissemination of private images, the Kiwi Farms has made private the videos which may be in contention. No party to this lawsuit has formally raised issue with, or threatened us because of, these particular videos, and we would generally not allow any person to obfuscate content on this website. This decision is done out of an abundance of caution for the potential victims.

We are attempting to balance two points:

- (1) the inherent public interest in one of the most prolific, well-known liberal political pundits in the whole of the United States, and
- (2) the privacy and safety of those featured in this content.

Putting the videos behind a registration barrier, in our opinion, will practice harm reduction by limiting the spread of this content to users already on the Kiwi Farms who are participating in the discussion.

We are sorry for those who have been negatively impacted by what appears to be a reckless disregard for the privacy and mental wellbeing of innocent people by a person with an inordinate amount of influence and wealth.

Anyone attempting to assert that the Kiwi Farms is the problem, and not the individuals who caused this breach of trust, is perhaps hoping to divert attention and culpability for actions which they are solely responsible for.

Kind regards,
Joshua Moon
Custodian of Records

See <https://kiwifarms.st/threads/steven-bonnell-ii-destiny-destiny-gg.29205/page-981>.

2. Although the original post which included the link to the Video was removed by Kiwi Farms, the Video resurfaced in multiple other posts on Kiwi Farms. Plaintiff had a subpoena served on Lolcow LLC on May 10, 2025. The subpoena requested the production of certain documents, and also the removal of the links to the Video depicting Plaintiff.

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3. Lolcow LLC/Kiwi Farms has cooperated with Plaintiff's requests to produce documents, and has expressed its willingness to remove all specified URLs which link to the Video upon receipt of an order from this Court. Lolcow LLC has reviewed the proposed order, attached hereto in redacted form as **Exhibit A**, and has stated that it will not object and will comply once the order is entered by the Court. Plaintiff is simultaneously filing a Motion for Leave to File Under Seal the unredacted proposed order which contains the specific URLs that link to the Video.

4. Pursuant to the Local Rules, Plaintiff met and conferred with Defendant regarding the instant motion. Defendant does not object to the entry of the proposed order to compel Lolcow LLC to remove the Video(s).

5. Plaintiff also requests an award of attorney's fees and related costs pursuant to 15 U.S.C. § 6851, incurred as a direct result of Defendant's unlawful disclosure of the Video. Plaintiff's expenses include legal and professional services necessary to pursue removal of the unlawful content from Kiwi Farms. Although Defendant has averred efforts to remove the unlawful content (ECF 42-1, ¶¶ 14-15), he has provided no evidence of such efforts and has not succeeded in having any content removed. The Plaintiff was forced to act at her own expense to mitigate ongoing harm. The Defendant should bear the cost of that mitigation. *See* 15 U.S.C. § 6851(b)(3)(A)(i) ("an individual may recover...reasonable attorney's fees and other litigation costs reasonably incurred").

WHEREFORE, Plaintiff respectfully requests that this Court order Lolcow LLC to remove the specific URLs which link to the Video on Kiwi Farms, as set forth in the proposed order, impose attorney's fees and costs on Defendant, and order any other relief it deems just and proper.

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Dated: May 21, 2025.

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/s/ Carlos A. Garcia Perez
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed with the Clerk and served via the CM/ECF filing portal on May 21, 2025, to the below counsel of record.

/s/ Carlos A. Garcia Perez
By: _____
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